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*Attorneys for Defendant Philadelphia
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

QUEST ACADEMY PREPARATORY
EDUCATION, a Nevada State Funded
charter school,

Plaintiff,

vs.

PHILADELPHIA INDEMNITY
INSURANCE COMPANY, a Pennsylvania
insurance business corporation,

Defendants.

CASE NO. 2:18-cv-01354-RFB-PAL

**STIPULATION TO MUTUALLY EXTEND
TIME TO FILE SUMMARY JUDGMENT
RESPONSES**

(First Request)

Defendant Philadelphia Indemnity Insurance Company (“Philadelphia”), by and through its attorneys, the law firm of FORAN GLENNON PALANDECH PONZI & RUDLOFF PC and Plaintiff Quest Academy Preparatory Education (“Quest”), by and through its attorneys, the law firm of HOLLEY, DRIGGS, WALCH, FINE, PUZEY, STEIN & THOMPSON, hereby agree and

1 stipulate to extend each party's time to respond to the other's Motion for Summary Judgment until
2 May 8, 2019. Each party filed its Motion for Summary Judgment on Thursday, March 28, 2019.
3 There is no hearing date set at this time.

4 This is the parties' first request to extend time to respond to the pending Motions for
5 Summary Judgment. The reason for this request is that Plaintiff's counsel has a pre-planned
6 absence from the jurisdiction until April 12, 2019. This extension will give both parties adequate
7 time to respond to the pending Motions.

8 This Stipulation is made in good faith and is not made for the purposes of delay. This is
9 demonstrated by the fact that both parties actually filed and served their Motions on the day before
10 the due date, rather than waiting for the final day. Further, the current due date for the Responses
11 is April 18, 2019, so this Stipulation is made well in advance of that time.

12 Accordingly, the parties agree and stipulate to extend each party's deadline to respond to
13 the other's Motion for Summary Judgment until May 8, 2019. Pursuant to LR 7-2(b), the deadline
14 to file and serve replies shall be extended in accordance to May 22, 2019.

15 Dated: April 9th, 2019

Dated: April 9th, 2019

16 HOLLEY, DRIGGS, WALCH, FINE,
17 PUZEY, STEIN & THOMPSON

FORAN GLENNON PALANDECH PONZI
& RUDLOFF PC

18 By: /s/ Michael R. Ayers
19 Richard F. Holley, Esq.
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22 *Attorneys for Plaintiff Quest Academy*
23 *Preparatory Education*

Attorneys for Defendant Philadelphia
Indemnity Insurance Company

24
25 IT IS SO ORDERED:

26 DATED: April 10, 2019.

27 
28 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

As an employee of Foran Glennon, I certify that a copy of the foregoing **STIPULATION TO MUTUALLY EXTEND TIME TO FILE SUMMARY JUDGMENT RESPONSES (First Request)** was served by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
- ☒ **BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Service List for the above-referenced case.
- ☐ **BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

Dated: April 9, 2019

/s/ Rita Tuttle
An Employee of Foran Glennon